

About this Policy

PERSOL Australia Holdings Pty Ltd ABN 58 620 794 130, Programmed Maintenance Services Limited ABN 61 054 742 264, and their related bodies corporate (as defined in the Corporations Act 2001 (Cth)) (**Programmed, us, we, our**) are committed to protecting your privacy.

Programmed is bound by the Privacy Act 1988 (Cth) and the New Zealand Privacy Act 2020, including the Privacy Principles set out in them, (the **Privacy Laws**). Accordingly, this Privacy Policy outlines :

- the types of Personal Information we collect;
- how and why we collect, hold, use and disclose that Personal Information;
- how you can access or correct your Personal Information; and
- how you can make enquiries or complaints about how we handle your Personal Information.

This Privacy Policy sits alongside our [Terms of Use](#) and any other terms and conditions that apply to our relationship with you.

Individuals in the EU

Some entities in the Programmed group may process personal data of individuals based in the European Union (**EU**), such as when those entities offer goods or services to those individuals. If you are based in the EU and the requirements of the “Regulation (EU) 2016/679”, known as the EU General Data Protection Regulation (**GDPR**) apply to the entities in the Programmed group, please refer to the Programmed GDPR Privacy Notice to understand how Programmed may handle your Personal Information. The Programmed GDPR Privacy Notice will override this Privacy Policy to the extent of any inconsistency.

Types of Personal Information we collect

What is Personal Information?

In this Privacy Policy, ‘**Personal Information**’ has the meaning given in the Privacy Laws. In general terms, Personal information refers to information or an opinion (whether true or not, and whether recorded in material form or not) about an identified individual, or an individual who is reasonably identifiable.

Some types of Personal Information are classified as ‘**Sensitive Information**’. In this Privacy Policy, Sensitive Information also has the meaning given in the Privacy Laws. In general terms, Sensitive Information is a sub-set of Personal Information that includes information about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual orientation or practices; criminal record; health information; genetic information that is not otherwise health information; biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric templates.

What types of Personal Information do we collect?

Programmed collects different Personal Information (including, in some cases, Sensitive Information) about you depending on our relationship with you. This can include:

- in the case of **prospective employees or contractors** – information relevant to us assessing your application and/or managing your engagement with us/our customers, including information contained in your application or résumé, recorded during any interview, or obtained through any pre-engagement checks, and government-issued identifiers such as tax file numbers. This may include your:
 - name;
 - address;
 - telephone number;
 - email address;
 - date of birth/age;
 - gender;
 - marital status;
 - employment history;
 - banking and superannuation details (including tax file number);
 - credit card details;
 - driver's licence and other occupational licence details; and
 - working rights documentation (such as passport number, visa details etc.).

We may also collect additional Personal Information required by our customers to manage your work with them (including additional certifications or qualifications or security clearances you may hold), and information required to manage any workplace incidents (such as photographs or other records of those incidents).

- in the case of customers **procuring our services** – information about our customer's personnel or our customer's end users or clients which are necessary for us to provide customers with our services, including personnel or end user's name and contact details (e.g. address, email address and phone number(s)), addresses where relevant to sites where we provide services and images related to the sites at which we will work (including aerial imaging data);
- in the case of individuals using the **Programmed GO Application (Programmed GO)** – information necessary for us to provide you with access to Programmed GO and manage your account, including your name and email address, and other general analytics information such as access dates and times, device information (including your IP address and web browser type), and app features or pages viewed;
- if you **access our website, systems or services** – technical information and general analytics, such as web browser type and browsing preferences, Internet service provider, referring/exit pages, date/time stamps, IP address, time zone and geolocation data (if applicable), some of which is collected automatically, arising from your use of our website and/or platforms, as well as information about your usage of our website and/or platforms when browsing;
- if you have **contacted us to make a complaint, provide feedback or submit an enquiry** – information we require to manage that complaint/feedback/enquiry, including your name, mailing or street address, email address, and telephone number(s);
- in the case of our **suppliers, vendors and distributors** – your personnel's name, address, email address, and telephone number(s); and
- if you have requested to receive **news about offers, promotions, or events from us** – your name, mailing or street address, email address, and telephone number(s),

or a combination of that Personal Information.

We may need to collect Sensitive Information about you in some circumstances, including:

- in the case of prospective employees or contractors – information regarding your medical history (including following and medical checks related to your engagement with us), racial or ethnic origin, criminal history and/or police checks, or sexual orientation (if you choose to disclose it);
- in the case of customers procuring our services – information we require in order to provide those services, such as the details of any health conditions or criminal history of our customer's end users or clients which we need to be aware in order to provide our services safely to you/them safely.

You are not required to provide us Personal Information, and may choose to engage with us anonymously or via a pseudonym. However we may not be able to provide you with our services or engage with you where we are unable to identify you, or do not have the Personal Information we require. For example, we may not be able to engage you as an employee or subcontractor where we do not have access to all required Personal Information.

How we collect your Personal Information

Programmed may collect Personal Information from you directly, including through our marketing, business development, operational, human resources, finance, risk, research or other activities, including when you:

- respond to a job advertisement;
- request our services directly;
- apply for a position with us or make yourself available as a candidate for employment generally or under labour hire arrangements;
- access or use our website;
- sign up to receive news and exclusive offers, promotions or events;
- make inquiries about us or our services, or otherwise communicate with us by email, phone, in person, via our website, or otherwise.

We will generally collect Personal Information directly from you, unless it is unreasonable or impracticable to do so. A copy of our Privacy Collection Notice will be made available wherever we seek to collect personal information.

In limited circumstances, we may collect information from other sources such as:

- your employer when your employer is seeking our services;
- referees proposed by you;
- your previous employers;
- third parties who provide checks and verifications (e.g. the police or Citrix (with your consent)), such in relation to criminal record checks, medical and working right checks and Working With Children Checks as required;
- agreements we enter into with you;
- order forms;
- surveys or other forms submitted to us (eg. website forms, online applications);
- online platforms or other technologies (for example if you place your details on a recruitment database or online platform, whether managed by us or another third party technology provider);
- third parties, such as our suppliers, vendors, distributors, agents and advisors, network contacts, regulatory bodies, government offices or your agents;
- individuals making complaints or reporting workplace incidents;
- other businesses that we are considering acquiring; and
- publicly available sources of information, such as ASIC.

We also collect data using various web technologies, including:

- **cookies**, which are files that our website and/or Programmed GO sends to your device, often including an anonymous identifier. You can set your browser to disable cookies. However, some parts of our website may not function properly (or at all) if cookies are disabled. For more information about cookies, and how to disable cookies, visit www.allaboutcookies.org;
- **log files**, which track actions occurring on our website and Programmed GO; and
- **web beacons, tags, and pixels**, which are electronic files used to record information about how you browse our website and/or Programmed GO.

In addition to Programmed's cookies, certain third parties may deliver cookies to your device for a variety of reasons. For example, we sometimes use various web analytics tools that help us to understand how visitors engage with our website. Any third party links or advertising on our website may also use cookies; you may receive these cookies by clicking on the link to the third party site or advertising. We do not control the collection or use of information by these third parties, and these third party cookies are not subject to this Privacy Policy. You should contact these companies directly if you have any questions about their collection and/or use of information, including how to opt-out of certain targeted advertising. When linking to any other site, you should always check the relevant website's privacy policy before providing any Personal Information.

How we store and protect your Personal Information

Programmed is committed to protecting your Personal Information. We store your Personal Information in our electronic record keeping systems/databases and, in some cases, in paper-based files. Personal Information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We will only combine or link Personal Information we hold about you with other Personal Information about you from third party sources in limited circumstances (such as where necessary to manage our relationship with you, or our general business audit processes).

We also protect your Personal Information using a range of physical and/or electronic security measures, settings and applications (eg. passwords and firewalls), and ensure that we train personnel who deal with your Personal Information on how to keep it secure, and how to comply with our policies and procedures. These measures are designed to protect Personal Information from unauthorised access; modification or disclosure; and from misuse, interference and loss.

However, particularly for electronic data stores and due to the fact that the Internet is inherently insecure, we cannot guarantee the security of transmission of Personal Information disclosed to us online. Accordingly, you transmit your Personal Information to us online at your own risk and are encouraged to exercise care in sending Personal Information via the internet. Please notify us immediately if you know or reasonably suspect that your Personal Information has been subject to any data breach, breach of security or other unauthorised activity.

We will keep your Personal Information only for as long as required for the purpose(s) for which it was collected, and otherwise as permitted or required by law. Where we no longer need to keep your Personal Information for any of the purposes for which we collected it, we will take reasonable steps to destroy or de-identify your Personal Information. If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing or internal risk management reasons, or as otherwise permitted or required by law).

How we use your Personal Information

Programmed will use your Personal Information for the primary purpose for which we collect it, or a secondary purpose permitted by law (such as where that use is related to the primary purpose, and is something you would reasonably expect us to do with the collected information). This includes using your Personal Information to:

- consider your application to work with us (whether as an employee or contractor), or manage our other relationship(s) with you;
- verify your identity (for example, if you request access to the Personal Information we hold about you);
- enable the proper operation and functionality of our services;
- conduct business with or provide services to our customers (including providing your Personal Information or Sensitive Information (such as health information and criminal records) to customers and to prospective employers if you are an applicant for employment or job placement, or if you are a Programmed employee/contractor), and otherwise administer our relationship with our customers;
- receive (or enable you to use) goods or services from third parties (including our suppliers, vendors and distributors);
- market or otherwise promote our services or seek your participation in promotions etc.;
- record details of incidents for insurance purposes;
- communicate with you, and to address any issues or complaints that we or you may have regarding our relationship;
- prevent, detect and investigate suspicious, fraudulent, criminal or other activity that may cause you, us or others harm, including in relation to our products and services;
- comply with our legal obligations, such as notifying you of matters that we may be required by law to do so;
- obtain professional advice; or comply with our obligations under applicable laws;
- identify opportunities to improve our services, including to create datasets to train artificial intelligence (AI) systems and to develop new technologies in connection with our services;
- gain insights about you so that we can work with you better, understand your preferences and interests, personalise your experience and/or enhance services you are offered and receive; and
- contact you regarding any of the above or for direct marketing purposes, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

We may also use your information for other purposes where we obtain your written consent or are otherwise permitted to do so by applicable laws (eg. where we believe doing so is necessary to lessen a serious threat to the life, health or safety of any individual).

Disclosing your Personal Information

We may disclose Personal Information to third parties in connection with the purposes described above. This may include disclosing your Personal Information to:

- our related companies;
- our professional advisers (such as lawyers, financial service providers, accountants or auditors) , joint venture and alliance partners and insurers;
- courts, tribunals, regulatory authorities, as required by law;
- to other companies and individuals where we are required to do so or for the purposes of complying with our obligations under contract;

- our customers (such as in relation to the provision of contractors or information related to personnel, or in relation to information related to the end users or clients of our customers);
- our employees, contractors and third party service providers who assist us in performing our functions and activities, or enabling you to utilise our systems. This may include payment systems operators and financial institutions, cloud service providers, data storage providers, shipping companies, telecommunications providers, IT support services providers, and payment providers, companies that assist us in recovering unpaid debts, and third party AI systems that assist us performing those functions or activities;
- third parties who provide checks and verifications (e.g. the police or Citrix (with your consent)), such as in relation to criminal record checks, medical and working right checks and Working With Children Checks and ASIC searches as required;
- organisations authorised by us to conduct promotional, research or marketing activities;
- third parties to whom you have authorised us to disclose your information (e.g. referees or account nominees);
- health professionals, such as in case of a medical emergency;
- any potential third party acquirer of our business or assets, and advisors to that third party; and
- any other person as required or permitted by law or where we have your consent to do so.

We may also provide statistics about our staff, prospective employees, customers, readers, sales, traffic patterns and related site functions to reputable third parties primarily to assist us to improve our services.

We will take all commercially reasonable steps to ensure those third party recipients use your Personal Information only for the purposes for which you provided it to us.

Direct Marketing

Programmed may use Personal Information we collect to provide you with direct marketing materials if you consent to receive direct marketing materials, or another exception applies. We will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party.

You may opt-out of receiving direct marketing communications from us at any time by contacting us, or by using the opt-out facilities provided in the relevant direct marketing communications.

Disclosure to overseas recipients

Programmed has operations and entities based in Australia, New Zealand and Malaysia. Our group companies operate in many other overseas jurisdictions globally, including Japan and Singapore.

The majority of Personal Information we collect from you is stored in servers located in Australia. However, your Personal Information may be stored by or transferred to our group companies, third party service providers or a host employer located in overseas jurisdictions (including Malaysia, Japan and Singapore) in order for us to achieve the functions and activities set out in this policy, for our internal business purposes (or as otherwise permitted by law).

If your Personal Information is sent to a recipient in a country with data protection laws which are at least substantially similar to the Privacy Laws, and where there are mechanisms available to you to enforce protection of your Personal Information under that overseas law, we will not be liable for a breach of the Privacy Laws if your

Personal Information is mishandled in that jurisdiction. If your Personal Information is transferred to a jurisdiction which does not have data protection laws as comprehensive as the Privacy Laws, we will take commercially reasonable steps to secure a contractual commitment from the recipient to handle your Personal Information in accordance with the Privacy Laws.

Access to and correction of your Personal Information

You are entitled at any time, upon request, to access your Personal Information held by us by contacting us via the details below. We will respond within a reasonable time after the request is made and give access to the information in the manner requested by you, unless it is impracticable to do so. However, where permitted by law, we will not disclose commercially sensitive information to you. We may charge you a reasonable administration fee for giving you access to the information requested.

If you believe that Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us via the details below. If we agree that the information needs to be corrected, we will take reasonable steps to amend it. If you request, we will also attempt to notify recipients of that Personal Information that it is incorrect, unless it is impractical or unlawful for us to do so.

If we refuse your requests regarding the above, we will explain the reasons for refusal and advise on the mechanisms to complain.

Complaints & Contact Us

If you wish to complain about our response to a request, or a potential breach of this policy or the Privacy Principles, please contact Programmed's Privacy Officer:

Privacy Officer
Programmed Maintenance Services Ltd
47 Burswood Road
Burswood WA 6100
or privacy@programmed.com.au

If you have raised a complaint with us and you are unsatisfied with the outcome or have further concerns about the way we handle your Personal Information, under the Australian Privacy Act 1988 (Cth), you may complain to the Information Commissioner at the Office of the Australian Information Commissioner, whose contact details are set out below:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Online: www.oaic.gov.au
Email: enquiries@oaic.gov.au

If you are located in New Zealand and are not satisfied with our response, you may contact the New Zealand Privacy Commissioner (www.privacy.org.nz).

We may change or update this Privacy Policy from time to time to keep up-to-date with legal requirements and the way we operate our business. An up-to-date version of this Privacy Policy is available at any time on this page. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes. We suggest that you check back regularly. If we make significant changes to our Privacy Policy, we will seek to inform you by notice on our website or by email.